

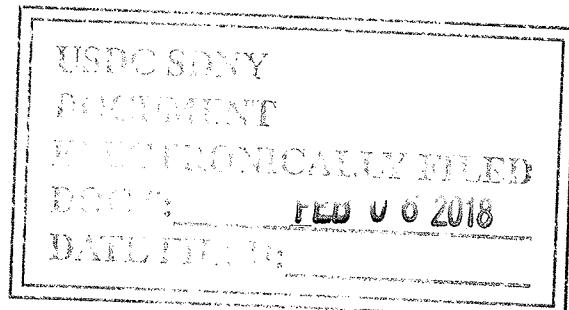


60 PARK PLACE, SUITE 1100, NEWARK, NJ 07102 973-424-9777 WWW.KROVATIN.COM
GERALD KROVATIN
HENRY E. KLINGEMAN**
HELEN A. NAU*
ERNESTO CERIMELE*
KRISTEN M. SANTILLO*

ALSO ADMITTED IN HI AND PA**
ALSO ADMITTED IN NY*

February 6, 2018

Honorable Alison J. Nathan
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007



Re: *United States v. Trevon Gross, 15-cr-769 (AJN)*

Dear Judge Nathan:

We represent Defendant Trevon Gross in the above-captioned matter. On February 5, 2018, Mr. Gross's motion for bail pending appeal was denied by the Second Circuit. *See Ex. A.* While Mr. Gross was originally scheduled to surrender on January 8, 2018, the Second Circuit stayed Mr. Gross's surrender date pending the outcome of his motion for bail pending appeal. *See Dkt. No. 696.* We write to respectfully request that the Court schedule Mr. Gross's new *surrender date for February 12, 2018.* In briefing the motions for bail pending appeal, the parties and this Court agreed that Mr. Gross is not a danger to his community and he does not pose a risk of flight. Mr. Gross requests this surrender date to enable him to prepare his family and his congregation for his surrender. We are happy to answer any of the Court's questions or address any concerns. Thank you for your attention to this matter.

Respectfully submitted,

/s/Kristen Santillo
Kristen Santillo

cc: All Counsel (by ECF)

2/6/18
SO ORDERED:

HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE